

1 WEIL, GOTSHAL & MANGES LLP
2 Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
3 Theodore Tsekerides (*pro hac vice*)
(theodore.tsekerides@weil.com)
4 Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
5 Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
6 New York, NY 10153-0119
Tel: 212 310 8000
7 Fax: 212 310 8007

8 KELLER BENVENUTTI KIM LLP
9 Tobias S. Keller (#151445)
(tkeller@kbkllp.com)
Peter J. Benvenutti (#60566)
10 (pbenvenutti@kbkllp.com)
Jane Kim (#298192)
11 (jkim@kbkllp.com)
650 California Street, Suite 1900
12 San Francisco, CA 94108
Tel: 415 496 6723
13 Fax: 650 636 9251

14 *Attorneys for Debtors and Reorganized
Debtors*

Entered on Docket

July 27, 2020

EDWARD J. EMMONS, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA



Signed and Filed: July 27, 2020

DENNIS MONTALI
U.S. Bankruptcy Judge

16 UNITED STATES BANKRUPTCY COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 In re:

20 **PG&E CORPORATION,**

21 **- and -**

22 **PACIFIC GAS AND ELECTRIC COMPANY,**

23 **Debtors.**

24 Affects PG&E Corporation
25 Affects Pacific Gas and Electric Company
 Affects both Debtors

* *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER APPROVING
STIPULATION PERMITTING
PATRICK MCCAFFREY, SALLY
MCCAFFREY, AND THE
MCCAFFREY FAMILY TRUST
TO AMEND PREVIOUSLY FILED
PROOF OF CLAIM**

1 The Court having considered the *Stipulation Permitting Patrick McCaffrey, Sally*
2 *McCaffrey, and the McCaffrey Family Trust to Amend Previously Filed Proof of Claim*, dated
3 July 24, 2020 [Dkt. No. 8524] (the “**Stipulation**”),¹ entered into by PG&E Corporation (“**PG&E**
4 **Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as reorganized debtors
5 (collectively, the “**Debtors**” and as reorganized pursuant to the Plan, the “**Reorganized Debtors**”)
6 in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and Patrick McCaffrey,
7 Sally McCaffrey, and the McCaffrey Family Trust (“**Movants**”), on the other hand; and pursuant
8 to such Stipulation and agreement of the Parties, and good cause appearing,

9 IT IS HEREBY ORDERED THAT:

10 1. The Stipulation is approved.

11 2. Movants shall be permitted to amend the Original Proof of Claim solely to add the
12 McCaffrey Family Trust as an additional claimant on the condition that such amended proof of
13 claim (the “**Amended Proof of Claim**”) shall be filed no later than seven (7) days after the entry
14 of this Order.

15 3. Nothing herein shall be construed to be a waiver by the Debtors or the Reorganized
16 Debtors, as applicable, or any other party in interest of any right to (i) object to the Asserted Claim
17 or the Amended Proof of Claim on any grounds other than the untimely filing thereof, or (ii) seek
18 to reclassify the Amended Proof of Claim.

19 4. Nothing herein shall be construed to be a waiver by Movants of their right to seek to
20 reclassify the Amended Proof of Claim or to assert any other right in contravention to or in
21 opposition of any asserted challenge to the Amended Proof of Claim.

22 5. Upon the timely filing of the Amended Proof of Claim pursuant to paragraph 2 of
23 this Order, the Original Proof of Claim shall be deemed expunged, and Prime Clerk LLC, the
24 claims agent appointed in the Chapter 11 Cases, shall be authorized to update the official claims
25 register to reflect the terms set forth herein.

26
27 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to
28 them in the Stipulation.

6. By entry of this Order, the Motion is deemed withdrawn with prejudice, and the Hearing vacated.

7. The Stipulation is binding on the Parties and each of their successors in interest.

8. The Stipulation constitutes the entire agreement and understanding of the Parties relating to the subject matter thereof and supersedes all prior agreements and understandings relating to the subject matter thereof.

9. This Court shall retain jurisdiction to resolve any disputes or controversies arising from the Stipulation or this Order.

*** END OF ORDER ***

Dated: July 24, 2020

DOWNNEY BRAND LLP

/s/ Jamie P. Dreher

Jamie P. Dreher, Esq.

Attorneys for Patrick McCaffrey, Sally McCaffrey, and the McCaffrey Family Trust